

Joseph S. May SBN 245924
LAW OFFICE OF JOSEPH S. MAY
1388 Sutter Street, Suite 810
San Francisco, CA 94109
Tel: (415) 781-3333
Fax: (415) 707-6600
joseph@josephmaylaw.com

Attorneys for Plaintiff GARY RICHARD LAWMAN
by and through his Guardian ad Litem Richard de Villiers

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

GARY RICHARD LAWMAN by and
through his Guardian ad Litem Richard de
Villiers,

Plaintiff,

v.

CITY AND COUNTY OF SAN
FRANCISCO; PHILLIP M. GORDON;
GLEN PAUL MINIOZA; BRIAN W.
KNEUKER; CARLOS GUTIERREZ;
CRAIG F. TOM; PATRICK F. PENE;
JULIO C. PALENCIA; ANDREW N.
BROWN; PAUL E. RAPICAVOLI;
MATTHEW M. O'SHEA; MICHAEL
HENNESSEY; GREG SUHR; ROEL L.
LAPITAN; FRANK LATKO a.k.a.
FRANZI LATKO; and DOES 1 through
50, inclusive,

Defendants.

CASE NO. C15-01202-DMR

**ADMINISTRATIVE MOTION FOR
LEAVE TO FILE MEMORANDUM IN
EXCESS OF 25 PAGES AND [PROPOSED]
ORDER**

Hearing Date: December 17, 2015
Time: 11:00 a.m.
Place: Courtroom 4, 3rd Floor
Judge: Hon. Donna M. Ryu

Action Filed: December 31, 2013
Removal: March 13, 2015
Trial Date: June 6, 2016

1 Pursuant to Civil Local Rule 7-11, Plaintiff respectfully requests leave to file a
2 memorandum opposing Defendants' motion for summary judgment in excess of the 25-page
3 limit for memorandum, set forth in Local Rule 7-4(b).

4 Defendants' motion for summary judgment, seeking judgment on each and every one of
5 Plaintiff's eight causes of action against numerous defendants, is exactly 25 pages. However,
6 Defendants have omitted many crucial portions of the voluminous record developed in this case,
7 which includes 12 depositions and more than 1000 pages of documents produced. In order to
8 provide the Court with an accurate and complete account of the facts of the case, Plaintiff will
9 likely need additional space. Also, Plaintiff will likely need more pages to present arguments
10 relating to each of the several claims and defenses at issue here.

11
12 Dated: November 19, 2015

LAW OFFICE OF JOSEPH S. MAY

13
14 /s/ Joseph S. May

15 By: JOSEPH S. MAY, Attorneys for Plaintiff
16 GARY RICHARD LAWMAN

17 **DECLARATION OF JOSEPH S. MAY [Local Rule 7-11(a)]**

18 I, Joseph S. May, declare:

19 I asked the City Attorney's office to stipulate but they refused.

20
21 I declare under penalty of perjury under the laws of the state of California and the United
22 States that the foregoing is true and correct.

23
24 Executed on November 19, 2015, at San Francisco, California.

25
26 /s/ Joseph S. May

27 JOSEPH S. MAY
28

[PROPOSED] ORDER

For good cause shown, Plaintiff is hereby granted leave to file a memorandum in opposition to the Defendants' motion for summary judgment up to but not exceeding 30 pages.

SO ORDERED.

Dated: November 20, 2015

